CPS CHEMICAL COMPANY, INC. P.O. BOX 162, OLD BRIDGE, N.J. 08857 • 201-727-3100
Subsidiaries: CPS CHEMICAL COMPANY • CPS CHEMICAL COMPANY OF ARKANSAS • CPS EXPORT, LTD. • CPS CHEMICALS CANADA
Telex 844532 • CPSOLDB

July 16, 1985

Mr. Richard Walka
Chief, Solid Waste Branch
Air & Waste Management Division
26 Federal Plaza
New York, NY 10278

Subject: Your Letter of June 12, 1985 Requesting
Revised Closure Plan as Required under
N.J.A.C. 7:26-9.8 and 9.10.
EPA ID # NJD002141190

Dear Mr. Walka:

Your letter of June 12 was received at our office on June 18, 1985. I attempted to reach Mr. Thomas Solecki of your staff on June 20 by phone and was finally able to make contact on June 24.

At that time I explained that we were in the final stages of submitting our revised Part A under RCRA and our initial Part B to the NJDEP and that our deadline for this submission was July 17, 1985. The information requested in your letter has been developed in conjunction with these Part A and Part B submissions.

Specific answers to each item in your June 12 letter are as follows:

Facility Description

1. Description of container storage area including size, location and supporting surface material.

A plan drawing of our facility showing the area designated for container (drum) storage, its size and location, is enclosed. The supporting surface material is eight (8) inches of concrete covered by three (3) inches of asphalt. The entire plan area is protected from the surrounding area by an 8" asphalt berm (curb).

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2. Description of tanks used for storage of hazardous waste including number, location (above or below ground) and capacity of each tank.

All tanks used in this service are welded, on quarter (1/4) inch thick carbon steel sides, bottom and deck.

The number and capacity of the tanks is excerpted from that portion of the Part B which deals with the same subject.

We have no below ground tanks at this facility. All storage tanks except those storing water are installed in fully concreted containment areas with conrete berms to a height of four (4) feet.

3. Certification of closure.

A certification to the effect that an outside professional engineering firm will oversee the closure plan and operation is attached.

4. Estimate of the year of closure.

The plant equipment is modern and is maintained in excellent condition. Therefore, we would not anticipate a year of closure prior to 2025.

5. Inventory of auxiliary equipment.

There is no equipment of this description as I understand the term according to my discussions with Mr. Solecki.

Removing All Inventory/Waste

1. Estimate of the amount of contaminated soil, if applicable.

The entire work area (four and one-half (4½) acres) is protected by eight inches of conrete, overlaid by three (3) to five (5) inches of asphalt. Therefore, there is an effective barrier to prevent contamination.

2. Estimate of contaminated rinse water.

Not applicable. Rinse waste with trace quantities of organics, would be stripped to minimum organic levels and would then be discharged to the Industrial sewer for ultimate treatment at the POTW.

3. Container storage - discrepancy between November 11, 1980 Part A and most recent closure plan.

The current level of hazardous waste drums stored in the designated area is approximately 1,000, which represents 50,000 gallons. Of this total it is estimated that 500, representing 25,000 gallons, will be pumped to waste fuel for ultimate incineration. The remaining 500 will be landfilled in a timely fashion.

Decontaminating the Facility

1. Rationale for assuming container storage area will not need decontamination.

As explained above, the complete work site, including the container storage area, is situated on eight (8) inches of conrete overlaid with three (3) or more inches of asphalt. Drums are inspected daily and leaks or spills cleaned up immediately. Thus, there is no reason to anticipate that a decontamination program will be required.

2. Procedures/parameters for decontaminating container storage area.

Based on the response to 1. above, this is felt to be not applicable.

3. Methods, parameters and rationale for determining if soil contamination exists.

As a result of sampling of monitoring wells in the surrounding area, it was determined by the NJDEP that some aquifer contamination has occurred. The time interval for this contamination probably dates back to at least the early 1970's. Current results indicate that the CPS site is clean and that a relatively small and shallow plume of organic contamination of unknown origin is present several hundred yards down gradient. A consent order for a remedial program to restore the aquifer to its normal level of purity is imminent,

There is no evidence that any contamination continues to be present or that supplemental removal procedures other than those which will result from the consent order will be required.

4. Procedures/parameters for decontamination of auxiliary equipment.

Not applicable.

Cost Estimate

1. Administrative cost.

Not applicable.

2. Contractor cost.

Not required except as noted in Closure Plan.

3. Contaminated soil sampling, analysis, removal and disposal.

None anticipated other than that noted under "Decontaminating the Facility."

4. Auxiliary equipment.

Not applicable.

5. Disposal of contaminated rinse water.

Addressed under "Removing of all Inventory/Waste.

6. Professional engineer's certification.

Although not specifically designated, one of several Engineering firms which we employ would be qualified to furnish this certification. The cost should be nominal, as the total closure should prove to be a routine procedure.

7. Contingency cost.

This was not specifically addressed as the current Cost Estimate is felt to be on the high side in view of the currently diminishing hazardous drum waste inventory.

Please advise if additional information is required.

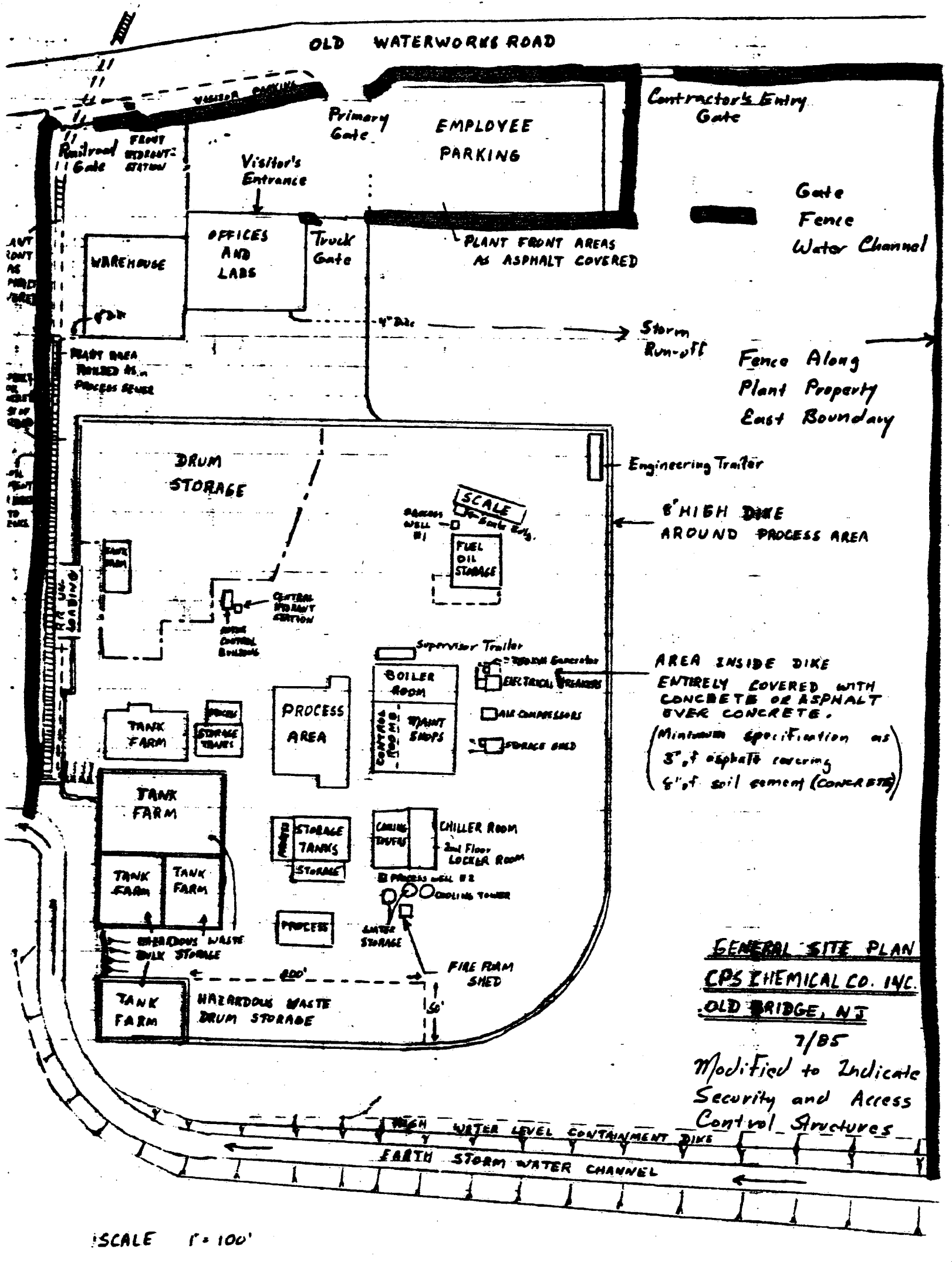
Very truly yours,

J. A. Rowe, Jr.
Vice President, Operations

JAR/cy

Encl.

cc: Mr. Richard A. Baker, USEPA
Mr. Joseph Rogalski, NJDEP
Mr. Frank Coolick, NJDEP



GENERAL SITE PLAN
CPS CHEMICAL CO. INC.
OLD BRIDGE, NJ
7/85
Modified to Indicate Security and Access Control Structures

GENERAL WASTE HANDLING EQUIPMENT DATA

STORAGE TANKS

No.	Capacity (gal.)	Dimensions Dia. x Ht.	Material of Construction	Wall Thickness	Top	Bottom	Vert. or Horizontal
4 5 6	20,000	10'6" x 32'5½"	Carbon Steel	1/4"	Coned	Flat	V
13 14 16 18	10,000	10'6" x 17'0"	Carbon Steel	1/4"	Coned	Flat	V
30 32	5,000	8' x 13'10"	Carbon Steel	1/4"	Coned	Flat	V
39	35,000	14' x 31'5"	Carbon Steel	1/4"	Coned	Flat	V
311	7,583	12'2" x 8'7"	Carbon Steel	1/4"	Flat	Coned*	V
R-3	20,000	12'0" x 23'0"	Carbon Steel	3/8"	Dished	Dished	H

* With bottom-side mounted agitator

** Blueprint copies of all vessel except 311 are attached.
Sketches of these vessels are attached.

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CERTIFICATION OF CLOSURE

The undersigned verfies that CPS Chemical Co., Inc. will employ an independent engineering firm to certify the closure of the subject facility at such time in the future as closure may occur. This independent firm will be qualified according to the laws of the State of New Jersey to certify the closure operation in accord with guidelines furnished by the USEPA and the NJDEP.

John A. Rowe, Jr.
Vice President, Operations

July 15, 1985
Date

David F. Giblin
DAVID F. GIBLIN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires June 23, 1988

July 15, 1985